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*Attorneys for Plaintiff Bureau of
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

BUREAU OF CONSUMER FINANCIAL
PROTECTION,

Plaintiff,

v.

PROGREXION MARKETING, INC., *et al.*,

Defendants.

Case No. 2:19-cv-00298-BSJ

**PLAINTIFF'S MOTION FOR LEAVE TO FILE
DOCUMENTS UNDER SEAL**

Pursuant to DUCivR 5-3 and the Modified Protective Order entered in this case (ECF 72), Plaintiff Bureau of Consumer Financial Protection (“Bureau”) moves the Court for leave to file under seal its Motion for Award of Monetary and Injunctive Relief, Assessment of Civil Money Penalties, and Entry of Final Judgment Against All Defendants on Count I and the following exhibits thereto:

- Ex. 1, Declaration of Camille Hinds (April 6, 2023)
- Ex. 2, Excerpts from the Deposition of Jeffrey Johnson
- Ex. 3, Excerpts from the Deposition of John C. Heath
- Ex. 4, Heath PC’s Response to Interrogatory No. 9 (May 14, 2021)
- Ex. 5, CFPB-PGX-118928
- Ex. 6, CFPB-PGX-120094
- Ex. 7, CFPB-PGX-127549
- Ex. 8, CFPB-PGX-128954
- PX-250, LEX0000158
- PX-284, LEX0004919
- PX-575B, CFPB-PGX-255683
- PX-608B, CFPB-PGX-256089

Because these documents, or information incorporated into these documents, are marked “Confidential” or “Attorneys’ Eyes Only”¹ and/or contain personally identifiable information, the Bureau seeks to file them under seal to comply with the Modified Protective Order. The Bureau reserves the right to file a motion seeking to unseal some or all of these documents on grounds that the information contained therein is not properly withheld from the public.

The Bureau has filed redacted public versions of these documents on the public docket.

Dated: April 11, 2023

Respectfully submitted,

/s/ Jonathan Reischl

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¹ Exhibits 5 and 7 are documents that were marked Attorneys’ Eyes Only by the non-party company that produced them to the Bureau.

*Attorneys for Plaintiff Bureau of
Consumer Financial Protection*

CERTIFICATE OF SERVICE

I certify that on April 11, 2023, I caused the sealed version of the above-referenced motion and exhibits to be served on all counsel of record via electronic mail. Counsel for the Defendants have previously agreed to service of such documents through these electronic means.

Dated: April 11, 2023

/s/ Jonathan Reischl
Enforcement Attorney
Bureau of Consumer Financial Protection